

1 Law Offices of Travis Gagnier, Inc., P.S.  
2 Attorney at Law  
3 33507 Ninth Avenue South, Bldg. F  
4 P.O. Box 3949  
5 Federal Way, WA 98063-3949  
6 253-941-0234; gagnierecf@bestbk.com

Judge Mary Jo Heston  
CHAPTER 13  
Hearing Date: September 22, 2022  
Hearing Time: 1:00 p.m.  
Response Date: September 15, 2022  
Location: Tacoma

7 **IN THE UNITED STATES BANKRUPTCY COURT  
8 WESTERN DISTRICT OF WASHINGTON AT TACOMA**

9 **IN RE:**

10 **NO. 22-40100**

11 **WASHINGTON, Larnell,**

**NOTICE OF HEARING, MOTION TO  
12 APPROVE SALE OF REAL PROPERTY  
13 and PROOF OF SERVICE**

14 **Debtor.**

**NOTICE OF HEARING**

15 YOU ARE HEREBY NOTIFIED that the attached motion will be heard before Judge  
16 Mary Jo Heston, Union Station, Courtroom H, 1717 Pacific Ave., Tacoma, WA 98401, on the  
17 22<sup>nd</sup> day of September 2022 at the hour of 1:00 p.m. or as soon thereafter as the Court may  
18 direct, at which time you may appear and offer your evidence as to why the Motion should not  
19 be granted.

20 **IF IT IS YOUR INTENTION TO BE HEARD IN THIS MATTER, YOU MUST GIVE  
21 WRITTEN RESPONSE TO THE COURT at UNION STATION 1717 PACIFIC AVENUE  
22 SUITE 2100 TACOMA WA 98402-3233 AND TO DEBTOR'S ATTORNEY, the LAW  
23 OFFICES OF TRAVIS GAGNIER INC P.S. P.O. BOX 3949, FEDERAL WAY, WA  
24 98063, no later September 15, 2022 or you will be deemed to be in default, the allegations herein  
25 may be taken as true, and the relief sought herein may be granted with an Order being entered  
26 accordingly.**

27 **NOTICE OF HEARING, MOTION TO APPROVE  
28 SALE OF REAL PROPERTY and PROOF OF  
SERVICE- 1**

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DATED this 1<sup>st</sup> day of September 2022  
Law Offices of Travis Gagnier, Inc., P.S.  
Attorneys for Debtor

/s/ Travis A. Gagnier  
Travis A. Gagnier, WSBA #26379  
Gregory Jalbert, WSBA #9480  
Of Counsel

## **MOTION**

COMES NOW the Debtor, by and through his attorney, Law Offices of Travis Gagnier, Inc., P.S., and move the court for an order approving the sale of his real property, which is legally described as follows:

Property Tax Parcel/Account No 459700022000

LOT 22 OF EMERALD HILLS, AS PER PLAT RECORDED IN VOLUME 23 OF PLATS, PAGES 81 THROUGH 84, RECORDS OF THURSTON COUNTY AUDITOR; SITUATE IN THE CITY OF LACEY, COUNTY OF THURSTON, STATE OF WASHINGTON.

The street address of the property is 6036 55<sup>th</sup> Court SE Lacy, Washington 98513.

The sale price of the property is \$425,000.00. The sale will be to Richard Morris and Kaylee Stanton, unmarried persons, and unrelated third parties to the Debtor. There is one consensual lien on the property. It is a note and deed of trust in favor of Lakeview Loan Servicing LLC c/o Loan Care LLC and a note and deed of trust in favor of Washington State Housing Finance Commission. There appears to be a homeowners' association, (Emerald Hills HOA). It will be paid from closing. An additional lien against the property is a statutory lien for real estate taxes owed Thurston County which will be paid at closing.

There are also agents' fees, excise taxes, escrow fees and other closing costs associated with the sale, which, of course, will need to be paid. All fees and costs associated with the sale should be paid from closing.

NOTICE OF HEARING, MOTION TO APPROVE  
SALE OF REAL PROPERTY and PROOF OF  
SERVICE-2

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1 At closing, the sum of \$2,900.00 will be paid the Chapter 13 trustee for disbursement  
2 pursuant to the Debtor's confirmed Chapter 13 Plan and as partial repayment of the plan arrears.

3 For the foregoing reasons, the Debtor asks that the court approves the sale and allow the  
4 proposed distribution as set forth in the attached Order.

5 DATED this 1<sup>st</sup> day of September 2022

6 Law Offices of Travis Gagnier, Inc., P.S.  
7 Attorneys for Debtor

8 /s/ Gregory J. Jalbert  
9 Gregory J. Jalbert, WSBA #9480  
Of Counsel

10  
11 **PROOF OF SERVICE**

12 I declare under penalty of perjury under the laws of the State of Washington that I filed  
13 the original of the foregoing with the United States Bankruptcy Court and served a true copy  
14 thereof to: U.S. Trustee and Chapter 13 Trustee via ECF and to Debtor and all creditors on the  
mailing matrix via U.S. first-class mail, postage pre-paid, on September 1, 2022.

15  
16 /s/ Shari Moody  
17 Shari Moody

18 Legal Assistant

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26 NOTICE OF HEARING, MOTION TO APPROVE  
SALE OF REAL PROPERTY and PROOF OF  
SERVICE- 3

27  
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